

Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

JACOB BEATY and JESSICA BEATY on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

No. 3:17-cv-05201-TSZ

PRETRIAL ORDER

JURISDICTION

This Court has jurisdiction over this matter and all claims under 28 U.S.C. § 332(d) because Plaintiffs' claims were filed as a proposed class action under the Class Action Fairness Act.

CLAIMS AND DEFENSES

Plaintiffs will pursue the following claims for relief at trial.

1. Violation of the Washington Consumer Protection Act (the "WCPA"), for damages related to Plaintiffs' payment of out-of-pocket expenses relating to the repair/replacement of the panoramic sunroof in their 2013 Ford Escape.

2. Fraudulent concealment under Washington law, for damages related to Plaintiffs' payment of out-of-pocket expenses relating to the repair/replacement of the panoramic sunroof in their 2013 Ford Escape.

1 Defendant Ford asserts, without conceding it bears the burden of proof on any matter,
2 the following defenses.

3 1. Ford made no false or misleading statements of material fact or omissions of
4 material fact and/or Ford made no false or misleading statements of material fact or omissions
5 of material fact with scienter.

6 2. Plaintiffs did not rely on any statements of material fact or omissions of material
7 fact made by Ford.

8 3. Any damages or injury claimed by Plaintiffs was caused by the intervening
9 actions and conduct of third parties over whom Ford had no control and for whom Ford is
10 neither responsible nor liable, or by superseding causes for which Ford bears no responsibility.

11 4. Ford did not have the requisite knowledge of any alleged defect at the time of
12 sale.

13 5. Plaintiffs' claims are preempted by federal statutes, rules, and regulations,
14 including Federal Motor Vehicle Safety Standard 205.

15 6. Ford's acts and practices were reasonable in relation to the development and
16 preservation of business or were not injurious to the public interest. *See* 6A Wash. Prac., Wash.
17 Pattern Jury Instr. Civ. WPI 310.02 (7th ed.) ("The Consumer Protection Act does not prohibit
18 acts or practices that are reasonable in relation to the development and preservation of business
19 or that are not injurious to the public interest.").

20 **ADMITTED FACTS**

21 The following facts are admitted by the parties.

22 1. Plaintiffs Jacob and Jessica Beaty purchased a new 2013 Ford Escape, Titanium
23 model (VIN: 1FMCU9J96DUB088941) on September 25, 2012.

24 2. Plaintiffs' 2013 Ford Escape included a panoramic sunroof.

25 3. Plaintiffs' 2013 Ford Escape was designed, in part, and manufactured, in part,
26 by Defendant Ford Motor Company.

1 4. On February 8, 2017, the panoramic sunroof in Plaintiffs' 2013 Ford Escape
2 shattered.

3 5. The panoramic sunroof in Plaintiffs' 2013 Ford Escape was repaired by Auto
4 Glass Professionals, located in Olympia, Washington.

5 **STIPULATIONS**

6 The Parties have met-and-conferred and agree:

7 1. Determination of liability should be bifurcated from damages, which are
8 stipulated to be \$610.94. Trial shall proceed on liability only.

9 2. The jury shall not be advised or instructed as to the amount of damages. The
10 jury should be advised: "Plaintiffs are suing for property damages, not personal injuries; and
11 the amount of Plaintiffs' damages is not an issue that the jury must decide."

12 **ISSUES OF LAW**

13 The following issues of law are to be determined by the Court.

14 1. The Court has already determined that genuine issues of material fact exist as
15 to whether Plaintiffs raised a viable claim for violation of the WCPA. Dkt. # 264 at 1-2.

16 2. The Court has already determined that genuine issues of material fact exist as
17 to whether Plaintiffs have raised a viable claim for fraudulent concealment under Washington
18 law. (*See generally id.*)

19 3. The Parties have met-and-conferred and agree that trial shall proceed on
20 liability only. In the event Plaintiffs prevail on liability, the Parties have stipulated that
21 Plaintiffs damages are \$610.94.

22 4. The Parties will have motions *in limine* for the Court's consideration.

23 **EXPERT WITNESSES**

24 The names and addresses of the expert witnesses to be called by each party at trial and
25 the issues upon which each will testify are as follows. The Parties preserve all objections to
26 admissibility of expert testimony.

On behalf of Plaintiffs:

PLAINTIFFS' EXPERT WITNESSES				
Name	Address	Issues of Testimony	Will Testify	Possible Witness Only
1 Hannemann, Neil	c/o Plaintiffs' counsel of record	The existence of a defect in Defendant's vehicles and in Beatys' Ford vehicle, the safety hazard posed by this defect, and parts sold rate for the Ford Escape and other Ford vehicles.	X	
2 Read, Thomas	c/o Plaintiffs' counsel of record	The existence of a defect in Defendant's vehicles and in Beatys' Ford vehicle, the characteristics of various glass types, glass manufacturing, glass performance, and glass failure analysis.	X	

On behalf of Defendant:

DEFENDANT'S EXPERT WITNESSES				
Name	Address	Issues of Testimony	Will Testify	Possible Witness Only
1 Carhart, Michael	Exponent, 23445 N. 19 th Ave., Phoenix, AZ	Automotive safety glass characteristics, performance, historical usage, federal safety and industry standards, and mechanical and biomechanical uses; Litigation testing.	X	
2 Eikey, Chris	(Formerly Ford Motor Co.) Fusion Engineering LLC, 1804 Centre Point Cir., Suite 112, Naperville, IL	Ford vehicle design, manufacture, testing, and certification; Ford's investigation of PSR claims, as necessary; Comparison of Ford PSR vehicles, as necessary; Inspection of Beaty Escape; Litigation testing.	X	
3 Padmanaban, Jeya	JP Research, 4300 El Camino Real, Suite 105, Los Altos, CA	Claim rate analyses for the Ford Escape and other Ford PSR vehicles, as necessary; Comparison of claims rates; Analysis of claims as to safety; and Responding to Plaintiffs' expert's parts replacement analysis.	X	

DEFENDANT'S EXPERT WITNESSES

	Name	Address	Issues of Testimony	Will Testify	Possible Witness Only
4	Taylor, Paul	Exponent, 149 Commonwealth Dr., Menlo Park, CA	Comparison of Ford PSR vehicles, as necessary; Rock modeling analysis.	X	
5	Verghese, Paul	Exponent, 1075 Worcester St., Natick, MA	Glass design, manufacturing, performance stresses, fracture analysis (fractography); Evaluation of Beaty Escape; Litigation Testing.	X	

OTHER WITNESSES

The names and addresses of witnesses, other than experts, to be used by each party at trial and the general nature upon which each is expected to testify are as follows. The Parties preserve all objections to admissibility of non-expert witness testimony.

On behalf of Plaintiffs:

PLAINTIFFS' OTHER WITNESSES

	Name	Address	General Nature Of Testimony	Will Testify	Possible Witness Only
1	Beaty, Jacob	c/o Plaintiffs' counsel of record	His personal experiences in purchasing the Ford vehicle at issue; and the damages Plaintiffs suffered in seeking repairs for the panoramic sunroof in the Ford vehicle.		X
2	Beaty, Jessica	c/o Plaintiffs' counsel of record	Her personal experiences in purchasing the Ford vehicle at issue and in driving the Ford vehicle when the panoramic sunroof spontaneously shattered; the damages Plaintiffs suffered in seeking repairs for the panoramic sunroof in the Ford vehicle.	X	

PLAINTIFFS' OTHER WITNESSES				
Name	Address	General Nature Of Testimony	Will Testify	Possible Witness Only
3 Eikey, Chris	c/o Defendant's counsel of record	Defendant's root cause and problem-solving efforts and any conclusions including actual or contemplated corrective actions related to panoramic sunroof failures in its vehicles; Defendant's communications with its suppliers and dealers and government entities including NHTSA and KATRI, regarding panoramic sunroof failures; Defendant's development, design, testing, and implementation of panoramic sunroofs in its vehicles; Defendant's discovery of the risk of panoramic sunroof failures; Any changes, and reasons for those changes, made to Defendant's panoramic sunroofs; and Defendant's warranty and part sales information relating to panoramic sunroof failures in its vehicles.		X
4 Hansen, Thayne	c/o Defendant's counsel of record	Defendant's warranty and goodwill practices relating to panoramic sunroof failures in its vehicles; and compensation Defendant has or may receive or request from its panoramic sunroof suppliers due to panoramic sunroof failures.		X, by deposition
5 Hanssens, Dominique	c/o Defendant's counsel of record	Defendant's expert regarding failure and/or incident rate analysis		X, by deposition

PLAINTIFFS' OTHER WITNESSES				
Name	Address	General Nature Of Testimony	Will Testify	Possible Witness Only
6 Tuneff, Mark	c/o Defendant's counsel of record	Defendant's root cause analysis efforts related to panoramic sunroof failures in its vehicles; Defendant's discovery and knowledge of the panoramic sunroof defect including through customer complaints, dealer reports, warranty data and other field data; Defendant's communications with NHTSA, KATRI, or other government entities regarding panoramic sunroof failures in its vehicles; Defendant's decision to not recall vehicles with panoramic sunroofs; and Defendant's use of warranty and part sales information in internal investigations.		X, by deposition

On behalf of Defendant:

DEFENDANT'S OTHER WITNESSES				
Name	Address	General Nature Of Testimony	Will Testify	Possible Witness Only
1 Beaty, Jacob	c/o Plaintiffs' counsel of record	Plaintiffs' 2013 Ford Escape and their claims.	X, by deposition	
2 Beaty, Jessica	c/o Plaintiffs' counsel of record	Plaintiffs' 2013 Ford Escape and their claims.		X*
3 Beveridge, Steven	c/o Auto Glass Professionals, 2900 Pacific Ave. SE, Olympia, WA 98501	The removal and replacement of the sunroof in Plaintiffs' 2013 Ford Escape.	X	

* Ford reserves the right to designate deposition testimony of Jessica Beaty if Plaintiffs do not present her for testimony, as indicated in the pretrial statement.

EXHIBITS

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
1	09/25/2012 Vehicle Buyer's Order, Scarff Ford Auburn. [PL- BEATY_000246-0251]	Disputed	Disputed	FRE 401-403, 901, Trial Stip	
2	Retail Installment Sale Contract Simple Finance Charge. [PL- BEATY_000252-0259]	Disputed	Disputed	FRE 401-403, 901, Trial Stip	
3	Picture of Plaintiffs' panoramic sunroof ("PSR"). [PL-BEATY 000260]	Stipulated	Stipulated		
4	"Contact Us" form on Ford website submitted by Plaintiff Jessica Beaty. [PL-BEATY 000265]	Stipulated	Stipulated		
5	Safecar.gov complaint submitted by Plaintiff Jessica Beaty. [PL-BEATY 000284]	Stipulated	Stipulated		
6	<i>Withdrawn as duplicative of Exhibit 401.</i>				
7	Enterprise Rental Agreement Summary. [FORD Beaty-Enterprise 0000003-0004]	Disputed	Disputed	FRE 401-403, 901, Trial Stip	
8	Enterprise Rental Agreement Invoice. [PL-BEATY_000263-0264]	Disputed	Disputed	FRE 401-403, 901, Trial Stip	
9	<i>Withdrawn.</i>				
10	VIN FSA Details. [Ford-Beaty 0023846-3857]	Disputed	Disputed	FRE 401-403, 901	
11	Declaration of Neil Hannemann.	Disputed	Disputed	FRE 401-403, 801-802, 805, 901; Trial Stip; Ford MILs	
12	Second Declaration of Neil Hannemann.	Disputed	Disputed	FRE 401-403, 801-802, 805, 901; Trial Stip; Ford MILs	
13	Parts list. [Ford-Beaty 0098695]	Disputed	Disputed	FRE 401-403, Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
14	Ford Warranty and Policy Manual excerpt. [Ford-Beaty 0009905-9935]	Disputed	Disputed	Incomplete; FRE 401-403, 901	
15	AWS Standards Claim List. [Ford-Beaty 0002342-2367]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
16	Spreadsheet of Defendant's vehicles with PSRs. [see Verghese Dep. Ex. 5; Eikey Dep. Ex. 35A]	Disputed	Disputed	FRE 401-403, 901, Ford MIL	
17	Safecar.gov (NHTSA) search results showing complaints. [see Verghese Dep. Ex. 8; Taylor Dep. Ex. 83]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
18	02/09/2007 CQIS Detail Report. [Ford-Beaty 0027485-7486]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
19	02/19/2007 CQIS Detail Report. [Ford-Beaty 0027477-7479]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
20	4/16/2007 CQIS Detail Report. [Ford-Beaty 0027480-7481]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
21	07/17/2007 CQIS Detail Report. [Ford-Beaty 0027482-7484]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
22	07/20/2007 Complaint. [Ford-Beaty 0038897]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
23	03/05/2008 CQIS Detail Report. [Ford-Beaty 0027487-7488]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
24	07/23/2008 Complaint. [Ford-Beaty 0081865-1866]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
25	07/29/2008 Complaint. [Ford-Beaty 0081868]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
26	05/20/2009 CQIS Detail Report. [Ford-Beaty 0083000-3002]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
27	06/25/2009 Complaint. [Ford-Beaty 0081877]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
28	07/17/2009 Complaint. [Ford-Beaty 0081867]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
29	08/12/2009 Complaint. [Ford-Beaty 0081870]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
30	09/09/2009 Complaint. [Ford-Beaty 0081862]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
31	09/10/2009 Complaint. [Ford-Beaty 0081861]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
32	10/13/2009 Complaint. [Ford-Beaty 0082089]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
33	02/01/2010 Complaint. [Ford-Beaty 0081863]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
34	02/06/2010 Complaint. [Ford-Beaty 0098912-8913]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
35	04/02/2010 Complaint. [Ford-Beaty 0081875]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
36	04/06/2010 Complaint. [Ford-Beaty 0081871-1873]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
37	04/16/2010 Complaint. [Ford-Beaty 0098902]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
38	04/28/2010 Complaint. [Ford-Beaty 0081874]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
39	05/12/2010 Complaint. [Ford-Beaty 0081869]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
40	05/25/2010 Complaint. [Ford-Beaty 0081860]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
41	07/06/2010 CQIS Detail Report. [Ford-Beaty 0027535- 7536]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
42	08/06/2010 CQIS Detail Report. [Ford-Beaty 0027537- 7538]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
43	12/09/2010 CQIS Detail Report. [Ford-Beaty 0083007- 3008]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
44	01/11/2011 Complaint. [Ford-Beaty 0081879]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
45	01/25/2011 CQIS Detail Report. [Ford-Beaty 0083009- 3010]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
46	02/01/2011 Complaint. [Ford-Beaty 0081863]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
47	06/07/2011 Complaint. [Ford-Beaty 0081880]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
48	06/07/2011 Complaint. [Ford-Beaty 0081881]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
49	07/19/2011 Complaint. [Ford-Beaty 0098906- 8909]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
50	07/26/2011 Complaint. [Ford-Beaty 0098910]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
51	08/12/2011 Complaint. [Ford-Beaty 0081882]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
52	11/17/2011 Complaint. [Ford-Beaty 0081878]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
53	12/02/2011 Complaint. [Ford-Beaty 0081864]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
54	04/03/2012 CQIS Detail Report. [Ford-Beaty 0092734- 2736]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
55	06/7/2012 CQIS Detail Report. [see Tuneff Dep. Ex. 18]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
56	08/01/2012 Complaint. [Ford-Beaty 0081876]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
57	08/28/2012 Complaint. [Ford-Beaty 0098903]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
58	08/30/2012 CQIS Detail Report. [Ford-Beaty 0093515- 3517]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
59	12/03/2012 CQIS Detail Report. [Ford-Beaty 0093367- 3369]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
60	01/16/2013 CQIS Detail Report. [see Tuneff Dep. Ex. 19]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
61	01/17/2013 Complaint. [Ford-Beaty 0038648- 8649]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
62	01/17/2013 CQIS Detail Report. [Ford-Beaty 0092997-2999]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
63	01/31/2013 CQIS Detail Report. [Ford-Beaty 0096681-6688]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
64	03/02/2013 Complaint. [Ford-Beaty 0098731-8732]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
65	03/08/2013 CQIS Detail Report. [Ford-Beaty 0093495-3497]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
66	03/19/2013 Complaint. [Ford-Beaty 0082111-2113]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
67	05/08/2013 CQIS Detail Report. [Ford-Beaty 0093447-3449]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
68	07/18/2013 CQIS Detail Report. [Ford-Beaty 0093040-3049]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
69	07/18/2013 Complaint. [Ford-Beaty 0098733]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
70	07/23/2013 Complaint. [Ford-Beaty 0098734]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
71	07/25/2013 Complaint. [Ford-Beaty 0038658]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
72	07/29/2013 CQIS Detail Report. [Ford-Beaty 0092652-2654]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
73	08/20/2013 CQIS Detail Report. [Ford-Beaty 0091239-1241]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
74	08/23/2013 CQIS Detail Report. [Ford-Beaty 0084176-4178]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
75	09/05/2013 CQIS Detail Report. [Ford-Beaty 0083015-3016]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
76	09/30/2013 CQIS Detail Report. [Ford-Beaty 0092915-2917]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
77	10/14/2013 CQIS Detail Report. [Ford-Beaty 0092899-2900]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
78	10/21/2013 Complaint. [Ford-Beaty 0038662]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
79	10/21/2013 Complaint. [Ford-Beaty 0081895]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
80	12/10/2013 CQIS Detail Report. [Ford-Beaty 0093268-3270]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
81	12/26/2013 CQIS Detail Report. [Ford-Beaty 0093504-3506]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
82	01/10/2014 Complaint. [Ford-Beaty 0081843]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
83	01/11/2014 Complaint. [Ford-Beaty 0098885]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
84	01/17/2014 Complaint. [Ford-Beaty 0098737]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
85	03/06/2014 Complaint. [Ford-Beaty 0081844-1845]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
86	03/10/2014 CQIS Detail Report. [Ford-Beaty 0093358-3360]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
87	03/10/2014 Complaint. [Ford-Beaty 0098738]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
88	03/13/2014 Complaint. [Ford-Beaty 0098739]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
89	04/14/2014 CQIS Detail Report. [Ford-Beaty 0093782-3784]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
90	04/14/2014 Complaint. [Ford-Beaty 0098740]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
91	06/20/2014 Complaint. [Ford-Beaty 0081845]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
92	06/25/2014 CQIS Detail Report. [Ford-Beaty 0097612-7614]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
93	08/04/2014 Complaint. [Ford-Beaty 0098741]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
94	08/13/2014 Complaint. [Ford-Beaty 0038694-8695]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
95	09/26/2014 Complaint. [Ford-Beaty 0081846]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
96	09/29/2014 CQIS Detail Report. [Ford-Beaty 0097043-7053]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
97	09/29/2014 CQIS Detail Report. [Ford-Beaty 0097031-7034]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
98	10/15/2014 Complaint. [Ford-Beaty 0081847]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
99	10/15/2014 Complaint. [Ford-Beaty 0038702- 8704]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
100	10/23/2014 Complaint. [Ford-Beaty 0098743]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
101	11/03/2014 CQIS Detail Report. [Ford-Beaty 0093401- 3403]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
102	11/17/2014 Complaint. [Ford-Beaty 0098746]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
103	11/17/2014 Complaint. [Ford-Beaty 0098745]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
104	11/27/2014 Complaint. [Ford-Beaty 0098735]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
105	12/08/2014 CQIS Detail Report. [Ford-Beaty 0093612- 3615]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
106	12/10/2014 Complaint. [Ford-Beaty 0098747]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
107	12/15/2014 Complaint. [Ford-Beaty 0081849]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
108	12/22/2014 CQIS Detail Report. [Ford-Beaty 0083122- 3123]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
109	12/30/2014 Complaint. [Ford-Beaty 0081850]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
110	01/02/2015 Complaint. [Ford-Beaty 0081848]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
111	01/02/2015 Complaint. [Ford-Beaty 0098748]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
112	01/12/2015 Complaint. [Ford-Beaty 0098749- 8750]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
113	01/29/2015 CQIS Detail Report. [Ford-Beaty 0093580- 3582]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
114	02/05/2015 Complaint. [Ford-Beaty 0098751]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
115	02/24/2015 Complaint. [Ford-Beaty 0038714- 8716]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
116	03/02/2015 CQIS Detail Report. [Ford-Beaty 0083564- 3566]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
117	03/10/2015 Complaint. [Ford-Beaty 0098752- 8753]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
118	03/19/2015 Complaint. [Ford-Beaty 0038723- 8725]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
119	04/07/2015 Complaint. [Ford-Beaty 0098890]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
120	04/07/2015 Complaint. [Ford-Beaty 0098754]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
121	04/20/2015 Complaint. [Ford-Beaty 0081851]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
122	05/22/2015 Complaint. [Ford-Beaty 0038737]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
123	06/16/2015 Complaint. [Ford-Beaty 0098891]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
124	06/26/2015 Complaint. [Ford-Beaty 0098725]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
125	08/11/2015 Complaint. [Ford-Beaty 0098893]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
126	08/19/2015 Complaint. [Ford-Beaty 0081886]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
127	08/24/2015 Complaint. [Ford-Beaty 0098720]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
128	08/24/2015 Complaint. [Ford-Beaty 0098895]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
129	08/24/2015 Complaint. [Ford-Beaty 0098894]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
130	09/08/2015 CQIS Detail Report. [Ford-Beaty 0093662- 3664]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
131	11/12/2015 Complaint. [Ford-Beaty 0098758]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
132	11/24/2015 Complaint. [Ford-Beaty 0098759]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
133	11/27/2015 Complaint. [Ford-Beaty 0098896- 8897]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
134	12/02/2015 Complaint. [Ford-Beaty 0098898]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
135	02/09/2016 Complaint. [Ford-Beaty 0098718]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
136	02/18/2016 Complaint. [Ford-Beaty 0081852]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
137	02/18/2016 Complaint. [Ford-Beaty 0098760; 0098726]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
138	03/02/2016 Complaint. [Ford-Beaty 0098717]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
139	03/04/2016 CQIS Detail Report. [Ford-Beaty 0092890- 2892]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
140	03/11/2016 Complaint.. [Ford-Beaty 003873- 8785]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
141	03/22/2016 CQIS Detail Report. [Ford-Beaty 0093311- 3313]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
142	05/05/2016 Complaint. [Ford-Beaty 0081887]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
143	05/18/2016 CQIS Detail Report. [Ford-Beaty 0093604- 3606]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
144	05/19/2016 Complaint. [Ford-Beaty 0081853]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
145	05/23/2016 Complaint. [Ford-Beaty 0038798]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
146	05/31/2016 CQIS Detail Report. [Ford-Beaty 0083167-3169]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
147	06/21/2016 CQIS Detail Report. [Ford-Beaty 0092788-2790]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
148	06/24/2016 CQIS Detail Report. [Ford-Beaty 0083229-8231]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
149	07/15/2016 Complaint. [Ford-Beaty 0038706]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
150	07/19/2016 Complaint. [Ford-Beaty 0038809]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
151	08/22/2016 Complaint. [Ford-Beaty 0081854]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
152	08/31/2016 Complaint. [Ford-Beaty 0081855]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
153	09/20/2016 Complaint. [Ford-Beaty 0098721]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
154	09/20/2016 Complaint. [Ford-Beaty 0098769]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
155	09/30/2016 Complaint. [Ford-Beaty 081856]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
156	10/27/2016 CQIS Detail Report. [Ford-Beaty 0097444-7456]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
157	11/14/2016 Complaint. [Ford-Beaty 0098778]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
158	11/14/2016 Complaint. [Ford-Beaty 0098724]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
159	11/16/2016 CQIS Detail Report. [Ford-Beaty 0083633- 3635]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
160	12/22/2016 CQIS Detail Report. [Ford-Beaty 0097481- 7489]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
161	01/13/2017 Complaint. [Ford-Beaty 0038837]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
162	02/06/2017 Complaint. [Ford-Beaty 0098874]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
163	02/07/2017 Complaint. [Ford-Beaty 0038861- 8863]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
164	02/10/2017 Complaint. [Ford-Beaty 0082187]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
165	02/13/2017 CQIS Detail Report. [Ford-Beaty 00975002- 7515]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
166	02/27/2017 Complaint. [Ford-Beaty 0081857]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
167	03/04/2017 Complaint. [Ford-Beaty 0081858]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
168	03/10/2017 Complaint. [Ford-Beaty 0038869- 8870]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
169	03/28/2017 Complaint. [Ford-Beaty 0098875]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
170	04/04/2017 Complaint. [Ford-Beaty 0081859]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
171	04/17/2017 CQIS Detail Report. [Ford-Beaty 0083028- 3029]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
172	04/26/2017 CQIS Detail Report. [Ford-Beaty 0097578- 7584]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
173	05/12/2017 CQIS Detail Report. [Ford-Beaty 0097585- 7597]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
174	05/30/2017 Complaint. [Ford-Beaty 0098876]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
175	06/16/2017 CQIS Detail Report. [Ford-Beaty 0097607- 7611]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
176	Collection of Complaints. [Ford-Beaty 0098914- 9097]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs; 184- pages of unrelated complaints objection	
177	11/19/2010 Emails. [Ford-Beaty 0030320- 0322]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
178	12/06/2011 Emails. [Ford-Beaty 0030325]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
179	02/2012 Emails. [Ford-Beaty 0030436- 0437]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
180	04/2012 Emails. [Ford-Beaty 0030490- 0493]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
181	07/2013 Emails. [Ford-Beaty 0030582- 0584]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
182	07/2013 – 08/2013 Emails. [Ford-Beaty 0030602-0604]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
183	09/24/2015 Emails. [Ford-Beaty 0031233-1234]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
184	“CD539 Moonroof Panel Cracked Vehicle Evaluation” presentation. [Ford-Beaty 0029884-9888]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
185	“Moonroof Panel Cracked Vehicle Evaluation” presentation. [Ford-Beaty 0029890-9955]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
186	“Moonroof Panel Tempered vs. Laminated Glass Performance” presentation. [Ford-Beaty 0029956-0020]	Stipulated	Disputed	FRE 401-403, Ford MILs	
187	“Moonroof Glass Panel Impact Testing” presentation. [Ford-Beaty 0031442-1469]	Stipulated	Disputed	FRE 401-403, Ford MILs	
188	“CD539 Moonroof Panel Tempered vs. Laminated Glass Performance” presentation. [Ford-Beaty 0031796-1860]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
189	“MKT Pano- Roof” presentation. [Ford-Beaty 0032126-2152]	Disputed	Disputed	Document not provided; Objections reserved.	
190	D472 FTM Lincoln MKT Shattered Glass presentation. [Ford-Beaty 0029646-9658]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
191	CD539N Glass Breakage Warranty and Benchmark Data presentation. [Ford-Beaty 0029866-9871]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
192	Ford Test Method for testing panoramic sunroofs. [Ford-Beaty 0002537-2542]	Stipulated	Disputed	FRE 401-403	
193	05/2014 "Defect Investigation on Panoramic Sunroof in KOREA" KATRI presentation. [Ford-Beaty 0037206-7234]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805; 901; Ford MILs	
194	09/29/2015 KATRI presentation. [Ford-Beaty 0037422-7439]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805; 901; Ford MILs	
195	07/10/2015 Emails. [Ford-Beaty 0037123]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805; 901; Ford MILs	
196	"2014 D472" document. [Ford-Beaty 0029627-9631]	Stipulated	Disputed	FRE 401-403, 602, Ford MILs	
197	G8D Report. [Ford-Beaty 0030314-0316]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805; 901; Ford MILs	
198	07/2013 Emails. [Ford-Beaty 0030571-0572]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
199	Global CCRG Concern document, "2013-2014 MKT Fixed Roof Glass Panel Stone Pecking.". [Ford-Beaty 0017147-7148]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
200	10/2015 Emails. [WSRI-Beaty_000726-0728]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805; 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
201	Warranty and Policy Manual. [Ford-Beaty 0008696-9094]	Disputed	Disputed	Document not provided; Objections reserved.	
202	AWS Standard Claims List. [Ford-Beaty 0000183-0323]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805; 901; Ford MILs	
203	Investigation of 2014 Ford Escape vehicles. [Ford-Beaty 0002563-2574]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
204	Workshop Manual – 2013 Escape. [Ford-Beaty 0005095-5106]	Stipulated	Disputed	FRE 401-403, 602	
205	2013 Ford Escape – Price List, multiple versions. [Ford-Beaty 0013520-3533]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
206	2013 Ford Escape – Major Product Changes, multiple versions. [Ford-Beaty 0013534-3663]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
207	501-17 Roof Opening Panel Description and Operation. [Ford-Beaty 0015916-5951]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
208	Global OASIS Search document. [Ford-Beaty 0026585]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
209	Global OASIS Search document. [Ford-Beaty 0026586]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
210	Global OASIS Search document. [Ford-Beaty 0026588]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
211	Global OASIS Search document. [Ford-Beaty 0026591]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
212	Spreadsheet of Defendant's vehicles with PSRs. [Ford-Beaty 0026670]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
213	Spreadsheet of Defendant's vehicles with PSRs, with program codes. [Ford-Beaty 0030145]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
214	Spreadsheet of Defendant's vehicles with PSRs, with ceramic paint information. [Ford-Beaty 0030146]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
215	Spreadsheet of Defendant's vehicles with PSRs, with ceramic paint information. [Ford-Beaty 0037035]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
216	Spreadsheet of Defendant's vehicles with PSRs, with base part numbers. [Ford-Beaty 0030147; 0030148; 0030149]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
217	Spreadsheet of Defendant's vehicles with PSRs, with base part numbers, relating to FMVSS 205. [Ford-Beaty 0030165; 0030166]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
218	Spreadsheet of Defendant's vehicles with PSRs. [Ford-Beaty 0030172]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
219	Spreadsheet of Defendant's vehicles, with status of ceramic printed area. [Ford-Beaty 0037039]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
220	Spreadsheet of Defendant's vehicles, with panoramic sunroof sizing. [Ford-Beaty 0037485]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
221	Spreadsheet of Defendant's vehicles, with comparison vs. frit percentage. (Duplicate of Ex. 274.) [Ford-Beaty 0038123]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
222	Spreadsheet of Defendant's vehicles with PSRs, with claims data. [Ford-Beaty 0034539]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
223	Spreadsheet of Defendant's vehicles, with warranty claims data. [Ford-Beaty 0098697]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
224	Spreadsheet of Defendant's vehicles, with warranty claims data. [Ford-Beaty 0098701]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
225	Spreadsheet of Defendant's vehicles, with warranty claims data. [Ford-Beaty 0098702]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
226	Spreadsheet of Defendant's vehicles, with Escape data. [Ford-Beaty 0099099; 0099109; 0099113; 0099116]	Stipulated	Disputed	FRE 401-403, 602, 801-802, 805; Ford MILs	
227	2010-2016 Lincoln MKT order guides. [Ford-Beaty 0040190-0198; 0040217-0227; 0040274-0282; 0040369-0377; 0040429-0437; 0040455-0463; 0040472-0480]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
228	2010-2016 Lincoln MKX order guides. [Ford-Beaty 0039610-9617; 0039650-9657; 0039722-9729; 0039770-9777; 0039818-9825; 0039842-9849; 0039906-9913; 0039954-9969; 0039984-9991; 0040052-0065]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
229	2010-2016 Lincoln MKT price lists. [Ford-Beaty 0039578; 0039584; 0039586; 0039593; 0039591; 0039596; 0039604; 0039607; 0039609]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
230	2007-2016 Lincoln MKX Price Lists. [Ford-Beaty 0040066; 0040069; 0040074; 0040076; 0040081; 0040085; 0040088-0890; 0040093; 0040098-0099]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
231	02/2018 General Service Bulletin. [Ford-Beaty 0044269-4274]	Stipulated	Stipulated		
232	05/2018 General Service Bulletin. [Ford-Beaty 0041517-1524]	Stipulated	Stipulated		
233	Lincoln Loyalty Business Case Guidelines. [Ford-Beaty 0041570-1574]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
234	Ford Loyalty Guidelines. [Ford-Beaty 0044262-4265]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
235	Production Purchasing Global Terms and Conditions. [see Hansen Dep. Ex. 11]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
236	04/2014 – 05/2014 Emails. [Ford-Beaty 0036955-6956]	Stipulated	Disputed	FRE 401-403, 602; Trial Stip	
237	"Body Exterior & Safety Quick Assessment" presentation. [Ford-Beaty 0030173-0191]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
238	"MKT Panoramic Roof" presentation. [Ford-Beaty 0030712-0734]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
239	05/2016 Emails with 06/23/2016 Letter with attachments. [Ford-Beaty 0038912-8925]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
240	Dealer/Fleet Request for OGC Review. [Ford-Beaty 0038984-8996]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
241	11/05/2013 Letter with attachments. [Ford-Beaty 0038902-8911]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
242	Standard Claims List. [Ford-Beaty 0000524]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
243	12/9/2011 Emails. [Ford-Beaty 0043538-3539]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
244	07/08/2014 Emails. [Ford-Beaty 0041550-1556]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
245	08/03/2015 Emails. [Ford-Beaty 0037257]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
246	02/15/2016 Emails. [Ford-Beaty 0037476]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
247	07/18/2016 Emails. [Ford-Beaty 0038356]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
248	<i>Withdrawn as duplicative of Exhibit 474.</i>				
249	NHTSA General Order. [Ford-Beaty 0026649-6655]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
250	07/25/2014 NHTSA letter regarding NHTSA ODI Investigation EA14-002. [Ford-Beaty 0026708-6715]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
251	EA14-002, Appendix B. [Ford-Beaty 0026717-6720]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
252	EA14-002, Appendix E. [Ford-Beaty 0026892]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
253	EA14-002, Appendix F. [Ford-Beaty 0027450]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
254	EA14-002, Appendix H. [Ford-Beaty 0038174]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
255	08/22/2014 Defendant's response to NHTSA ODI Investigation EA14-002. [Ford-Beaty 0026656-6669]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs; Duplicates	
256	08/22/2014 Defendant's response to NHTSA ODI Investigation EA14-002. [Ford-Beaty 0040695-0702; 0041488]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs; Duplicates	
257	07/16/2016 Defendant's response to NHTSA ODI Investigation EA14-002. [Ford-Beaty 0027440-7446]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
258	04/15/2016 Emails. (Duplicate of Ex. 279.) [Ford-Beaty 0026646-6647]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
259	04/21/2016 Emails. [Ford-Beaty 0037768-7769]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
260	05/17/2016 Emails. [Ford-Beaty 0037950-7952]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
261	Evaluation of Glass Break Risk for Monolithic or Laminated Thing Glass. [WRSI-Beaty 008041]	Stipulated	Stipulated		
262	Spreadsheet of Defendant's vehicles with PSRs. [see Eikey Dep. Ex. 37]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
263	"Glass frit study for MKX" Presentation. [Ford-Beaty 0044414-4427]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
264	"Ford/Corning Gorilla Glass Window Update" presentation. [Ford-Beaty 0043611-3640]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
265	08/17/2015 Emails. [Ford-Beaty 0044488-4492]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
266	"Potential alternatives to current frit solution on Tempered Glass" presentation. [Ford-Beaty 0044353-4356]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
267	11/03/2015 Emails. [Ford-Beaty 0037464-7467]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
268	Alliance of Automobile Manufacturers – Roadmap to Remedy for Panoramic Sunroof Shattering. [Ford-Beaty 0037411-7413]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
269	05/25/2016 Emails. [Ford-Beaty 0038122]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
270	03/2010 Emails. [Ford-Beaty 0042080-2081]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
271	10/01/2014 Emails. [Ford-Beaty 0044437-4438]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
272	04/15/2014 Emails. [Ford-Beaty 0043737-3739]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
273	Spreadsheet of vehicles pursuant to NHTA ODI Investigation EA14-002. [Ford-Beaty 0037042]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
274	Spreadsheet of vehicles pursuant to NHTA ODI Investigation EA14-002. (Duplicate of Ex. 221.) [Ford-Beaty 0038123]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
275	Ford Document "Certain 2011-2014 Model Year MKX Vehicles sold in South Korea." [Ford-Beaty 0041565]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
276	09/20/2016 Emails. [Ford-Beaty 0044396-4397]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
277	"PGW – D472 Program Temper Fragmentation Weight vs. Ford Warranty Claims" chart. [Ford-Beaty 0036994-6995]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
278	"Design Failure Mode Effects Analysis" document. [Ford-Beaty 0027657]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
279	04/2016 Emails. (Duplicate of Ex. 258.) [Ford-Beaty 0026646-6647]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
280	12/10/2012 Letter from Shelter Insurance Companies. [Ford-Beaty 0026871-6891]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	
281	Spreadsheet showing panoramic sunroof failures. [Ford-Beaty 0030696]	Disputed	Disputed	FRE 401-403, 602, 801-802, 805, 901; Ford MILs	

PLAINTIFFS' EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
282	05/31/2017 Email. [Ford-Beaty 0031264]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
283	"VSC – Moonroof Glass" presentation. [Ford-Beaty 0031282- 1292]	Stipulated	Disputed	FRE 401-403, 602; Ford MILs	
284	"Market Offering Complexity Analysis for the US of 2013- 2018 Ford Escape. [Ford-Beaty 0104197- 4199]	Stipulated	Disputed	FRE 401-403, 602	
285	<i>Withdrawn as duplicative of Exhibit 612.</i>				
286	05/24/2019 Report of Dominique Hanssens, Ph.D..	Disputed	Disputed	FRE 401-403, 801-802, 805, 901; Trial Stip; Ford MILs	
287	<i>Withdrawn as duplicative of Exhibit 610.</i>				
288	<i>Withdrawn as duplicative of Exhibit 608.</i>				
289	02/22/2019 Report of Thomas Read.	Disputed	Disputed	FRE 401-403, 801-802, 805, 901; Trial Stip; Ford MILs	

Ford identifies the following trial exhibits that it may use at trial. Ford's identification of trial exhibits is being made subject to Ford's Motions *in Limine* and the Court's pretrial rulings. By identifying exhibits below, Ford does not concede their admissibility.

DEFENDANT'S EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
400	Carfax Vehicle History Report.	Disputed	Disputed	FRE 401, 402, 403 (as to dates after the incident); 901	
401	Autoglass Professionals Invoice Dated 2/13/2017 (Redacted). [PL-BEATY 000002]	Disputed	Disputed	FRE 401, 402, 403	
402	February 9, 2017 Claim Submitted to Travelers re Sunroof Replacement (Redacted). [FORD Beaty-Travelers 0000203]	Disputed	Disputed	FRE 401, 402, 403, 802, 805, 901; Trial stip	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
403	Attorney Representation Agreement signed by Jessica Beaty and her attorneys (Redacted). [PL-BEATY 000291; 000293; 000296]	Disputed	Disputed	FRE 401, 402, 403, 802, 805, 901	
404	<i>Withdrawn as duplicative of Exhibit 3.</i>				
405	2017 1002 Eikey Beaty VI Photos.	Stipulated	Stipulated		
406	2017 1002 Exponent Beaty VI Photos.	Disputed	Disputed	FRE 901	
407	2018 0518 P Verghese Howd VI Photos.	Disputed	Disputed	FRE 401, 402, 403; Plaintiffs' MILs	
408	Exemplar Vehicle Photos Ford Escape.	Disputed	Disputed	FRE 901	
409	Exemplar Vehicle Photos Ford Edge.	Disputed	Disputed	FRE 901	
410	Exemplar Vehicle Photos Ford Explorer.	Disputed	Disputed	FRE 901	
411	Exemplar Vehicle Photos Lincoln MKS.	Disputed	Disputed	FRE 901	
412	Exemplar Vehicle Photos Lincoln MKT.	Disputed	Disputed	FRE 901	
413	Exemplar Vehicle Photos Lincoln MKX.	Disputed	Disputed	FRE 901	
414	Exemplar Vehicle Comparison Photos.	Disputed	Disputed	FRE 901	
415	Vehicle Scans of Exemplar Vehicles.	Disputed	Disputed	FRE 901	
416	NHTSA and US DOT, Title 49 of the Code of Federal Regulations (Transportation). "Federal Motor Vehicle Safety Standard No. 205; Glazing Materials," 571.205, 49 CFR, Ch. V., Revision 10/1/12.	Disputed	Disputed	FRE 401, 402, 403 (should Plaintiffs be overruled, they seek a limiting instruction); Plaintiffs' MILs	

DEFENDANT'S EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
417	American National Standard for Safety Glazing Materials for Glazing Motor Vehicles and Motor Vehicle Equipment Operating on Land Highways – Safety Standard. ANSI/SAE Z26.1-1997, Z26.1a-1980, supplement to ANSI Z26.1-1977.	Disputed	Disputed	FRE 401, 402, 403 (should Plaintiffs be overruled, they seek a limiting instruction); Plaintiffs' MILs	
418	FMVSS 205 Certification .	Disputed	Disputed	FRE 401, 402, 403 (should Plaintiffs be overruled, they seek a limiting instruction); Plaintiffs' MILs	
419	ANSI AS-3 Certification Report, Carlex Research & Development Laboratory, Report No. SGSMAS3-001, Dated Sept. 20, 2006. [Ford-Beaty 0020795-20798]	Disputed	Disputed	FRE 401, 402, 403 (should Plaintiffs be overruled, they seek a limiting instruction); Plaintiffs' MILs	
420	Compliance Demonstration Plan and Report, Regulation No. 205 re Moonroof System. [Ford-Beaty 0020799]	Disputed	Disputed	FRE 401, 402, 403 (should Plaintiffs be overruled, they seek a limiting instruction); Plaintiffs' MILs	
421	Compliance Demonstration Plan and Report re Moonroof in Escape. [Ford-Beaty 0020825-20826]	Disputed	Disputed	FRE 401, 402, 403 (should Plaintiffs be overruled, they seek a limiting instruction); Plaintiffs' MILs	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
422	Data and Illustrations Documenting "Glass Surface Compressive Stress Measurement: 2008 Ford Edge, 2017 Ford Escape, 2013 Ford Explorer, 2016 Lincoln MKS, 2014 Lincoln MKT, 2015 Lincoln MKX," Exponent Report No. TEC1902598 6058, 2019.	Disputed	Disputed	FRE 901	
423	Video, Frame Captures, Still Photos, and Data Documenting "Durability Evaluations: 2013 Ford Explorer," Exponent Report No. TEC1902598 1372, 2019.	Disputed	Disputed	FRE 901	
424	Video, Frame Captures, Still Photos, and Data Documenting "Durability Evaluations: 2017 Ford Escape," Exponent Report No. TEC1902598 9225, 2019.	Disputed	Disputed	FRE 901	
425	Video, Frame Captures, Still Photos, and Data Documenting "PSR Panel Sarbacane Impact," Exponent Report No. TEC1902598 6467, 2019.	Disputed	Disputed	FRE 901	
426	Video, Frame Captures, Still Photos, and Data Documenting "Dolly Rollover Test 1998 Ford Expedition," Exponent Report No. PH09825, 2005.	Disputed	Disputed	FRE 401, 402, 403, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
427	Video, Frame Captures, Still Photos, and Data Documenting "Dolly Rollover Test 2004 Volvo XC90," Exponent Report No. PH10303, 2006.	Disputed	Disputed	FRE 401, 402, 403, 901	
428	Video, Frame Captures, Still Photos, and Data Documenting "NHTSA TRC Sled Tests: Advanced Side Glazing Research – Neck Injury Assessment," 1998-1999.	Disputed	Disputed	FRE 401, 402, 403, 901	
429	Video, Frame Captures, Still Photos, and Data Documenting "Retention Characteristics of Production Laminated Side Windows," Exponent Report No. TRK7393, 2006.	Disputed	Disputed	FRE 401, 402, 403, 901	
430	Video, Frame Captures, Still Photos, and Data Documenting "ATD Drop Test Modified 1991 Ford Aerostar Rear Passenger Sliding Door," Exponent Report No. PH11069, 2007.	Disputed	Disputed	FRE 401, 402, 403, 901	
431	Video, Frame Captures, Still Photos, and Data Documenting "ATD Drop Tests Modified International CE School Bus Rear Emergency Egress Doors with Fixed, Perimeter-Bonded, HPR-Formulated Laminated Glass," Exponent Report No. 1607555, 2019.	Disputed	Disputed	FRE 401, 402, 403, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
432	Video, Frame Captures, Still Photos, and Data documenting Linear Impactor Testing of 2005 Lincoln Aviator at 12.4 mph, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
433	Video, Frame Captures, Still Photos, and Data documenting Linear Impactor Testing of 2003 Lincoln Aviator at 15 mph, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
434	Video, Frame Captures, Still Photos, and Data documenting Linear Impactor Testing of 2005 Chrysler Pacifica at 12.4 mph, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
435	Video, Frame Captures, Still Photos, and Data documenting Linear Impactor Testing of 2006 Chrysler Pacifica at 15 mph, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
436	Demonstratives, Video, Frame Captures, Still Photos, and Data documenting Linear Impactor Testing of 2006 Volvo V70 at 12.4 mph, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
437	Demonstratives, Video, Frame Captures, Still Photos, and Data documenting Linear Impactor Testing of 2004 Volvo V70 at 15 mph, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
438	Video, Frame Captures, Still Photos, and Data Documenting "Quasi-Static Window Load Test 2007 Ford Fusion," Exponent Report No. 1509594, 2016.	Disputed	Disputed	FRE 401, 402, 403, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
439	Video, Frame Captures, Still Photos, and Data Documenting "Quasi-Static Load Test 2002 Volvo S60 Right Front Door Assembly," Exponent Report No. TRK7290, 2006.	Disputed	Disputed	FRE 401, 402, 403, 901	
440	Video, Frame Captures, Still Photos, and Data Documenting "Quasi-Static Push Test," Exponent Report No. PH11066, 2007.	Disputed	Disputed	FRE 401, 402, 403, 901	
441	Video, Frame Captures, Still Photos, and Data Documenting "Quasi-Static Load Test, 1991 Ford Aerostar, Second Row Left-Side Window," Exponent Report No. 0803853, 2008.	Disputed	Disputed	FRE 401, 402, 403, 901	
442	Video, Frame Captures, Still Photos, and Data documenting Quasi-Static Push-Out Testing of 2003 Lincoln Aviator, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
443	Video, Frame Captures, Still Photos, and Data documenting Quasi-Static Push-Out Testing of 2007 Ford Freestyle, Ford, 2014.	Disputed	Disputed	FRE 401, 402, 403, 901	
444	Ford Design Process Flowchart.	Stipulated	Stipulated		
445	2013 Ford Escape NHTSA IIHS Ratings Ex.	Disputed	Disputed	FRE 401, 402, 403, 901	
446	Ford Michigan Proving Grounds Photos and Diagrams – Overview.	Stipulated	Stipulated		
447	Ford Vehicles with PSR Chart. [Eikey Dep. Ex. 35]	Stipulated	Stipulated		
448	Webasto Eval Glass Break Chart. [WRSI-Beaty 001713]	Stipulated	Stipulated		

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
449	Escape Panoramic Roof Glass to Bracket Urethane Bond. [Ford-Beatty 0017144]	Disputed	Disputed	FRE 401, 402, 403, 901	
450	MKX Urethane Skips. [Ford-Beatty 0017145-17146]	Disputed	Disputed	FRE 901	
451	<i>Withdrawn as duplicative of Exhibit 199.</i>				
452	Ford Standard Reporting Method for Problem Solving re Cracks in Glass (Front/Rear). [Ford-Beatty 0029779-29792]	Disputed	Disputed	FRE 901	
453	2015 1004 PPT re Consumer Driven 6-Sigma re CSL MY:2015, G02-Glass Broken/Chipped/Cracked/Distorted. [Ford-Beatty 0029793-29814]	Disputed	Disputed	FRE 901	
454	151027 - 005_AliPresentationUpdate.pptx. [Ford-Beatty 0029815-29838]	Disputed	Disputed	FRE 901	
455	Sept. 22, 2016 PPT re CD539 Moonroof Panel Tempered v. Laminated Glass Performance . [Ford-Beatty 0031869-31879]	Stipulated	Stipulated		
456	Oct. 10, 2016 PPT re Moonroof Panel Cracked Vehicle Eval. [Ford-Beatty 0029890-29955]	Stipulated	Stipulated		
457	U388 MY 2014. [Ford-Beatty 0037147-37149]	Stipulated	Stipulated		

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
458	Engineering Material Specification re Ceramic Coating Performance Requirements, Float Laminated for Windship; Ceramic Coating Performance Requirements, Tempered, Body Glass. [Ford-Beaty 0032804-32808]	Disputed	Disputed	FRE 401, 402, 403	
459	Ceramic Paint Percentages. [Ford-Beaty 0038115]	Disputed	Disputed	FRE 802, 805, 901	
460	5D_MKT Moon roof cracks FTM_101916 (Ford - Beaty 0030022)	Disputed	Disputed	FRE 802, 805, 901	
461	<i>Withdrawn as duplicative of Exhibit 277.</i>				
462	D472 FTM Front Glass Frit Study, Webasto. [Ford-Beaty 0029636-29644]	Disputed	Disputed	FRE 802, 805, 901	
463	Report: MKT Fixed Glass Roof Glass Breakage Spike (Report R/1000 by Production Month). [Ford-Beaty 0032153-32154]	Stipulated	Stipulated		
464	Average Panorama Sunroof Data Information, Webasto. [Ford-Beaty 0038176]	Disputed	Disputed	FRE 802, 805, 901	
465	<i>Withdrawn as duplicative of Exhibit 238.</i>				
466	Inafla Drawings – Escape. [Ford Beaty - Inafla 0000042-00043.]	Disputed	Disputed	FRE 901	
467	Inafla Drawings – MKC. [Ford Beaty - Inafla 0000044-00046]	Disputed	Disputed	FRE 901	
468	Inafla Drawings – MKS. [Ford Beaty - Inafla 0000039-00041]	Disputed	Disputed	FRE 901	

DEFENDANT'S EXHIBITS

Ex #	Description	Authenticity	Admissibility	Objection	Admitted
469	Inafla Drawings – MKX. [Ford Beaty - Inafla 0000047-00048]	Disputed	Disputed	FRE 901	
470	Inafla Drawings – Explorer. [Ford Beaty - Inafla 0000054-00055.]	Disputed	Disputed	FRE 901	
471	General Service Bulletin (GSB): Tempered Glass Crack Diagnosis. [Ford-Beaty 0039535-39536]	Stipulated	Stipulated		
472	Ford Response re KMOVSS 34. [Ford-Beaty 0037140-37141]	Disputed		FRE 802, 805, 901	
473	2013 1023 High-Level Summary re 2013 Lincoln MKX Panoramic Roof Glass Investigation. [Ford-Beaty 0037133]	Stipulated	Stipulated		
474	2013 1120 Ltr fr Ford to Jin-Hwan Yoon re Manufacturing Defect Investigation of Toughened Glass Panoramic Roofs. [Ford-Beaty 0037134-37138]	Disputed	Disputed	FRE 802, 805, 901	
475	Aug. 10-11, 2015 Email Thread re GTR 6 Comments to OICA. [Ford-Beaty 0037290-37291]	Disputed	Disputed	FRE 802, 805, 901	
476	2015 0826 Contribution To The Informal Working Group on Panoramic Sunroof Glazing (PSG) - Counter Proposal to GRSG-109-00 For Amendments to GTR No. 6. [Ford-Beaty 0037346-37351]	Disputed	Disputed	FRE 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
477	Draft Field Review Committee Fact Sheet re 14X08: 2007-2014 MKX (Korea Only) - Panoramic Roof Fragmentation. [Ford-Beaty 0043842]	Disputed	Disputed	FRE 802, 805, 901	
478	2013 1104 Ltr fr Erik Jonnart to Jin-Hwan Yoon re Panoramic Roof Stability. [Ford-Beaty 0044202-44204]	Disputed	Disputed	FRE 802, 805, 901	
479	Ford PPT re Laminated Glass Cracking. [Ford-Beaty 0031735]	Stipulated	Stipulated		
480	Engineering Material Specification re Glass, Performance, Safety, Float Laminated For Windshields; Laminated For Side Glass And Backlites; Laminated For All Other Glass Applications; Tempered For Side Glass And Backlites; Tempered For All Other Glass Applications; Polycarbonate (Pc) Coated, For Side Glazing And Backlites; Polycarbonate (Pc) Coated, For All Other Glazing Applications. [Ford-Beaty 0032593-32617]	Disputed	Disputed	FRE 901	
481	Engineering Material Specification, Ceramic Coating Performance Requirements, Float Laminated Glass for Windshield; Ceramic Coating Performance Requirements, Tempered Body Glass. [Ford-Beaty 0021384-21388]	Disputed	Disputed	FRE 401, 402, 403 (to the extent this document discusses procedures for non-PSR glass); 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
482	Conf Business Info - Supplier Test Results . [Ford-Beaty 0026684-0026697]	Disputed	Disputed	FRE 401, 402, 403	
483	Ford Response to NHTSA Investigation EA14-002. [Ford-Beaty 0026646-27476]	Stipulated	Stipulated		
484	<i>Withdrawn as duplicative of Exhibit 5.</i>				
485	September 12, 2016 Ford PPT re Moonroof Panel, Tempered vs. Laminated Glass Performance. [Ford-Beaty 0029956-30020]	Stipulated	Disputed	FRE 401, 402, 403 (as to information regarding acoustics), 802, 805	
486	March 3, 2017 Ford PPT re Moonroof Glass Panel, Impact Testing. [Ford-Beaty 0031881-31905]	Stipulated	Disputed	FRE 802, 805	
487	Global Benchmark Study - Panoramic Sunroofs PPT. [Ford-Beaty 0042477-42512]	Disputed	Disputed	FRE 401, 402, 403	
488	February 1, 2017 Ford PPT re Fixed Glass Roof Benchmarking. [Ford-Beaty 0030062-30068]	Stipulated	Stipulated		
489	May 4, 2017 Ford PPT re Moonroof Glass Panel Impact Performance Status & Next Steps Alignment. [Ford-Beaty 0031615-31639]	Stipulated	Disputed	FRE 802, 805	
490	Core Engineering: April 4, 2017 Ford PPT re Moonroof Glass Panel, Impact Performance, Status & Next Steps Alignment (Draft).	Stipulated	Disputed	FRE 802, 805	
491	Core Engineering: June 16, 2017 Ford PPT re: Quick Assessment.	Disputed	Disputed	FRE 802, 805, 901	
492	<i>Withdrawn as duplicative of 448.</i>				

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
493	Core Engineering: June 16, 2017 Ford PPT re: Quick Assessment.	Disputed	Disputed	FRE 802, 805, 901	
494	Core Engineering: June 16, 2017 Ford PPT re: Quick Assessment.	Disputed	Disputed	FRE 802, 805, 901	
495	2010 0902 Report Alternative Roof Panel- External/Internal Loading Requirement. [Ford-Beaty 0037360-37364]	Stipulated	Stipulated		
496	2011 1024 Report Alternative Roof Panel Trustmark. [Ford-Beaty 0037365-37369]	Stipulated	Stipulated		
497	2013 Model Year Ford Warranty Guide	Disputed	Disputed	FRE 802, 805	
498	140000 - 014_Glassprocess.pptx. [Ford-Beaty 0031203-31204]	Disputed	Disputed	FRE 401, 402, 403	
499	Photograph of Exponent's Test and Engineering Center in Phoenix, Arizona.	Stipulated	Disputed	FRE 901	
500	Schematics and graphics depicting a 2013 Ford Escape and other Ford vehicles.	Disputed	Disputed	FRE 901	
501	Diagrams and photographs of the glazing in a 2013 Ford Escape and other Ford vehicles.	Disputed	Disputed	FRE 901	
502	Photographs, videos, charts, graphics, and diagrams describing select testing, literature, and other related documents.	Disputed	Disputed	FRE 901	
503	Diagrams and charts depicting the glazing tests conducted by Webasto.	Disputed	Disputed	FRE 401, 402, 403, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
504	Photographs and charts depicting Exponent measurements of exemplar sunroof panel surface compression and geometry.	Disputed	Disputed	FRE 901	
505	Photographs, videos, and charts depicting the glazing sharp impact testing conducted by Exponent.	Disputed	Disputed	FRE 901	
506	Photographs, videos, and charts depicting glass stress produced during normal and durability course driving in exemplar vehicles.	Disputed	Disputed	FRE 901	
507	Photographs and graphics depicting the characteristics and properties of different types of glazing.	Disputed	Disputed	FRE 401, 402, 403, 901	
508	Photographs, videos, and graphics describing the study of fractography.	Disputed	Disputed	FRE 401, 402, 403, 901	
509	Photographs and graphics depicting the fracture mechanics of different types of glazing.	Disputed	Disputed	FRE 401, 402, 403, 901	
510	Photographs, charts, and graphics depicting the history of the NHTSA's glazing research program.	Disputed	Disputed	FRE 401, 402, 403, 901	
511	Photographs and graphics depicting the protocols utilized by the NHTSA for the evaluation of glazing materials.	Disputed	Disputed	FRE 401, 402, 403, 901	
512	Schematics and charts depicting the measurement of loads and injury metrics generated during occupant-to-glazing impact.	Disputed	Disputed	FRE 401, 402, 403, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
513	Photographs, videos, and charts depicting automotive safety glazing push-out, penetration, and push out loads and energy capacity.	Disputed	Disputed	FRE 401, 402, 403, 901	
514	<i>Withdrawn.</i>				
515	Photographs, videos, and graphics depicting head bulge and head penetration with laminated glass.	Disputed	Disputed	FRE 401, 402, 403, 901	
516	Fragments of fractured tempered safety glass from Exponent sharp impact testing of an exemplar sunroof panel.	Stipulated	Stipulated		
517	Illustration depicting the scoring of the Abbreviated Injury Scale.	Disputed	Disputed	FRE 802, 805, 901	
518	Charts and graphics depicting consumer complaints of sunroof breakage versus complaints resulting in an accident or crash.	Disputed	Disputed	FRE 901	
519	Charts and graphics depicting consumer complaints of sunroof breakage versus complaints of injury.	Disputed	Disputed	FRE 901	
520	Charts and graphics depicting consumer complaints of injury versus the scoring system of the abbreviated injury scale.	Disputed	Disputed	FRE 901	
521	Charts and graphics depicting acoustic emission of sunroof fracture versus sounds that may be encountered by a motorist.	Disputed	Disputed	FRE 901	
522	<i>Withdrawn.</i>				

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
523	Photographs, diagrams, charts, and graphics depicting residual stress distribution and crack behavior in tempered glass.	Disputed	Disputed	FRE 901	
524	Photographs depicting tempered panoramic sunroof panel fractured due to external impact.	Disputed	Disputed	FRE 401, 402, 403, 901	
525	Photographs depicting tempered glass fracture surface and fracture origin.	Disputed	Disputed	FRE 901	
526	Photographs and diagrams depicting changes in geometry of curved tempered glass after fracture.	Disputed	Disputed	FRE 901	
527	Photographs, diagrams, and graphics depicting ceramic frit on glass and KATRI's representation of changes to tempering stresses with and without frit.	Stipulated	Stipulated		
528	Photographs and graphics depicting the fractured front PSR of the Beaty 2013 Ford Escape.	Stipulated	Stipulated		
529	Photographs depicting field fractures of sunroof panels in Ford vehicles.	Disputed	Disputed	FRE 901	
530	Taylor Education Summary from CV.	Disputed	Disputed	FRE 802, 805, 901	
531	Scope of Testimony: Differences in Overall Vehicle Designs Among Ford Models with PSRs; PSR Geometry, Placement, Characteristics; Potential for Impact by Road Debris.	Disputed	Disputed	FRE 901	
532	Figures 2, 3, 4; Ford Exemplar Photo of Ford Escape.	Disputed	Disputed	FRE 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
533	Dimensions of Ford Escape and PSR Location.	Disputed	Disputed	FRE 901	
534	Ford Escape: PSR Geometry.	Disputed	Disputed	FRE 901	
535	Photos of Ford Models with PSRs (Exemplar Photos of 2016 Ford Escape, 2016 Lincoln MKS, 2014 Lincoln MKT, 2015 Lincoln MKX, 2013 Ford Explorer, 2008 Ford Edge.	Disputed	Disputed	FRE 901	
536	Photos of Ford Models with PSRs (Exemplar Photos of 2008 Ford Edge, 2013 Ford Explorer, 2014 Lincoln MKT, 2016 Ford Escape, 2016 Lincoln MKS, 2015 Lincoln MKX).	Disputed	Disputed	FRE 901	
537	Top View, Vehicle Scans of Ford Models with PSRs (MKS, Escape, MKT, MKX, Edge, Explorer).	Disputed	Disputed	FRE 901	
538	Front View, Vehicle Scans of Ford Models with PSRs (MKS, Escape, MKT, MKX, Edge, Explorer).	Disputed	Disputed	FRE 901	
539	Side View, Vehicle Scans of Ford Models with PSRs (MKS, Escape, MKT, MKX, Edge, Explorer).	Disputed	Disputed	FRE 901	
540	Dimensions of Ford Models with a PSR and PSR Location (Edge, Escape, Explorer, MKS, MKT, MKX) .	Disputed	Disputed	FRE 901	
541	Ford Models with PSRs: Panoramic Sun-Roof Characteristics - Table	Disputed	Disputed	FRE 901	
542	Ford Models with PSRs, Glass Areas and Fritted Glass Areas – Graphs.	Disputed	Disputed	FRE 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
543	Model of Debris Kicked up by a Lead Vehicle .	Disputed	Disputed	FRE 901	
544	Ford Escape, Percent of Debris that Hit Each Glass Section - Escape (All Impacts) and Escape (High Energy Impacts).	Disputed	Disputed	FRE 901	
545	Percent of Debris that Hit Each Glass Section, Percent of Road Debris Hitting Glass and Vehicle Model (Windshield Hit, Front Pane Hit, Rear Pane Hit).	Disputed	Disputed	FRE 901	
546	Percent of Debris that Hit Each Glass Section with High Energy, Percent of Road Debris Hitting Glass v. Vehicle Model (Windshield Hit, Front Pane Hit, Rear Pane Hit).	Disputed	Disputed	FRE 901	
547	Percent of Debris that Hit Each Glass Section with High Energy, Percent of Road Debris Hitting Glass v. Vehicle Model (Front Pane Hit and Rear Pane Hit).	Disputed	Disputed	FRE 901	
548	Claim Rate per Unit Sold by Model Year (2013-2017).	Disputed	Disputed	FRE 901	
549	Claim Rate Per Unit Sold , 2013 Model Year Ford Escape.	Disputed	Disputed	FRE 901	
550	Claim Rate Per Vehicle Year By Calendar Year (2012-2018).	Disputed	Disputed	FRE 901	
551	Claim Rate Per Vehicle Year for 2013 Calendar Year	Disputed	Disputed	FRE 901	
552	Chances of Glass Shattering Claims for 20 Years of Vehicle Life.	Disputed	Disputed	FRE 901	
553	Glass Shattering Claim Rates by Vehicle Manufacturer.	Disputed	Disputed	FRE 401, 402, 403, 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
554	Glass Shatter Rates Per Unit Sold by Model Year (2013-2017).	Disputed	Disputed	FRE 901	
555	Glass Shatter Rates Per Unit Sold for 2013 Model Year .	Disputed	Disputed	FRE 901	
556	Claim Rate Per Unit Sold: Front Panel vs. Rear Panel.	Disputed	Disputed	FRE 901	
557	Corrected Hannemann Analysis, Replacement Parts Sold Per Unit Sold.	Disputed	Disputed	FRE 901	
558	Comparison of Replacement Part Sales Rates, Ford Flex v. Ford Escape.	Disputed	Disputed	FRE 901	
559	Claim Rate Per Unit Sold - By Make, Ford v. Lincoln.	Disputed	Disputed	FRE 901	
560	Claim Rate Per Unit Sold - By Model.	Disputed	Disputed	FRE 901	
561	Claim Rate Per Unit Sold: Front vs. Rear, Ford and Lincoln Proposed Class Vehicle.	Disputed	Disputed	FRE 901	
562	Risk of Crash and Fatality Associated with Panoramic Sunroof Vehicles.	Disputed	Disputed	FRE 901	
563	Conclusions .	Disputed	Disputed	FRE 901	
564	Glass Shatter Complaint Rates by Vehicle Manufacturer - NHTSA ODI (Office of Defect Investigation).	Disputed	Disputed	FRE 901	
565	NHTSA ODI – Glass Shatter Rates per Unit Sold by Model Year.	Disputed	Disputed	FRE 901	
566	Evaluation of Mr. Hannemann's Opinions and Analysis - Rate of Replacement Parts Sold per Unit Sold.	Disputed	Disputed	FRE 901	
567	Comparison of Replacement Part Sales Rates – Conventional Sunroof vs. PSR Sunroof (Ford Escape).	Disputed	Disputed	FRE 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
568	NHTSA ODI Investigation PE-12-027 ODI Resume.	Disputed	Disputed	FRE 401, 402, 403	
569	NHTSA Recall Letter 12V-568.	Stipulated	Stipulated		
570	NHTSA Recall Letter 13V-051.	Stipulated	Stipulated		
571	NHTSA EA 14-002 – Letters requesting data from Ford, Hyundai, Nissan and Volkswagen.	Stipulated	Stipulated		
572	<i>Withdrawn as duplicative of Exhibit 249.</i>				
573	NHTSA EA 06-001 – ODI Closing Resume.	Disputed	Disputed	FRE 401, 402, 403	
574	NHTSA, <i>Motor Vehicle Safety Defects and Recalls</i> (May 2011), DOT HS 808 795 (“NHTSA Defects & Recalls”).	Disputed	Disputed	FRE 401, 402, 403	
575	NHTSA ODI Investigations EA 14-002 ODI Resume.	Stipulated	Stipulated		
576	NHTSA ODI Investigations PE 13-035 ODI Resume.	Stipulated	Stipulated		
577	American Speech-Language-Hearing Association; “Loud Noise Dangers,” https://www.asha.org/public/hearing/Loud-Noise-Dangers/ , retrieved 5/24/2019.	Disputed	Disputed	FRE 802, 805, 901	
578	American Speech-Language-Hearing Association, “Recreational Firearm Noise Exposure,” https://www.asha.org/public/hearing/Recreational-Firearm-Noise-Exposure/ , retrieved 5/24/2019.	Disputed	Disputed	FRE 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
579	Luepke P, et al.; "An Evaluation of Laminated Side Window Glass Performance During Rollover," SAE Paper No. 2007-01-0367, Society of Automotive Engineers, Warrendale, PA, 2007.	Disputed	Disputed	FRE 802, 805, 901	
580	NHTSA, "The 100 Car Naturalistic Driving Study, Phase I – Experimental Design," DOT HS 808 536, 2002.	Disputed	Disputed	FRE 802, 805, 901	
581	NHTSA, "The 100-Car Naturalistic Driving Study, Phase II – Results of the 100-Car Field Experiment," DOT HS 810 593, 2006	Disputed	Disputed	FRE 802, 805, 901	
582	Nyquist GW, et al.; "Pick-Up Truck Rear Window Tempered Glass as a Head Restraint – Head and Neck Loads Relative to Injury Reference Criteria," SAE Paper No. 841658, Society of Automotive Engineers, Warrendale, PA, 1984.	Disputed	Disputed	FRE 802, 805, 901	
583	OSHA, "Worker Safety Series: Protecting Yourself from Noise in Construction," OSHA 3498-12N, 2011.	Disputed	Disputed	FRE 802, 805, 901	
584	Patrick LM; "Human Tolerance to Impact – Basis for Safety Design," SAE Paper No. 650171, Society of Automotive Engineers, Warrendale, PA, 1965.	Disputed	Disputed	FRE 401, 402, 403, 802, 805, 901	
585	Patrick LM; "Glazing for Motor Vehicles – 1995," SAE Paper No. 952717, Society of Automotive Engineers, Warrendale, PA, 1995.	Disputed	Disputed	FRE 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
586	Patrick LM; "A Primer on Automotive Glazing – Part 1," Automotive Engineering, July 1996.	Disputed	Disputed	FRE 802, 805, 901	
587	Patrick LM; "A Primer on Automotive Glazing – Part 2," Automotive Engineering, August 1996.	Disputed	Disputed	FRE 802, 805, 901	
588	Pierce J, et al.; "Retention Characteristics of Production Laminated Side Windows," SAE Paper No. 2007-01-0376, Society of Automotive Engineers, Warrendale, PA, 2007.	Disputed	Disputed	FRE 802, 805, 901	
589	<i>The Abbreviated Injury Scale 2005 Revision, Update 2008.</i> Association for the Advancement of Automotive Medicine, Des Plaines, Illinois.	Disputed	Disputed	FRE 802, 805, 901	
590	<i>The Abbreviated Injury Scale 2015 Revision.</i> Association for the Advancement of Automotive Medicine, Chicago, Illinois.	Disputed	Disputed	FRE 802, 805, 901	
591	Lawn, B.R. and Marshall, D.B., "Indentation Fracture and Strength Degradation in Ceramics," in <i>Fracture Mechanics of Ceramics</i> , vol. 3, Plenum Press, pp. 205-229 (1978).	Disputed	Disputed	FRE 802, 805, 901	
592	Marshall, D.B., Lawn, B.R., and Chantikul, P., "Residual Stress Effects in Sharp Contact Cracking, Part 2 Strength Degradation," <i>Journal of Materials Science</i> , 14 (1979), pp. 2225-2235.	Disputed	Disputed	FRE 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
593	Tempered Safety Glass from International Building Code, Glass and Glazing; https://codes.iccsafe.org/content/IBC2015/chapter-24-glass-and-glazing	Disputed	Disputed	FRE 401, 402, 403, 802, 805, 901	
594	Redner, A.S. and Hoffman, B.R., Detection of Tensile Stresses Near Edges of Laminated and Tempered Glass, Glass Processing Days, 18–21 June 2001, www.glassfiles.com .	Disputed	Disputed	FRE 802, 805, 901	
595	Buckling Mechanics from Gere, J.M. and Timoshenko, S.P., Mechanics of Materials, Second edition, PWS Publishers, p. 559 (1984).	Disputed	Disputed	FRE 802, 805, 901	
596	Krohn, M.H. et al., Effect of Enameling on the Strength and Dynamic Fatigue of Soda–Lime–Silica Float Glass, J. Am. Ceram. Soc., 85 [10] 2507–14 (2002).	Disputed	Disputed	FRE 802, 805, 901	
597	Ministry of Land, Infrastructure and Transport, and Korea Automobile Testing and Research Institute, Overall Review of CPA (ceramic printed area).	Stipulated	Stipulated		
598	Lee, K. B. et al., A study on toughened glass used for vehicles and its testing methods, Proceedings of the 24th Enhanced Safety of Vehicles conference, June 2015.	Disputed	Disputed	FRE 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
599	Contact Stresses from Young, W. C., Roark's Formulas for Stress and Strain, McGraw-Hill Book Co., Sixth edition, p. 650 (1989).	Disputed	Disputed	FRE 802, 805, 901	
600	Lawn, B.R. and Marshall, D.B., "Contact fracture resistance of physically and chemically tempered glass plates: a theoretical model," Physics and Chemistry of Glasses, vol. 18, no. 1, February 1977, pp. 7-18.	Disputed	Disputed	FRE 802, 805, 901	
601	Applied Survival Analysis" by Hosmer, D., and S. Lemeshow, Wiley 1999; "An Introduction to Survival Analysis Using Stata", revised 3rd edition by Cleves, Gould and Gutierrez, Stata Press, 2016.	Disputed	Disputed	FRE 802, 805, 901	
602	Fleiss, J.L., B Levin, and M.C. Paik, <i>Statistical Methods for Rates and Proportions</i> (Hoboken, New Jersey: John Wiley & Sons, Inc., 2003).	Disputed	Disputed	FRE 802, 805, 901	
603	Carhart, M – CV.	Disputed	Disputed	FRE 802, 805, 901	
604	Carhart, M - Expert Report.	Disputed	Disputed	FRE 802, 805, 901	
605	Eikey, C – CV.	Disputed	Disputed	FRE 802, 805, 901	
606	Eikey, C - Expert Report.	Disputed	Disputed	FRE 802, 805, 901	
607	Padmanaban, J – CV.	Disputed	Disputed	FRE 802, 805, 901	
608	Padmanaban, J - Expert Report.	Disputed	Disputed	FRE 802, 805, 901	
609	Taylor, P – CV.	Disputed	Disputed	FRE 802, 805, 901	
610	Taylor, P - Expert Report.	Disputed	Disputed	FRE 802, 805, 901	

DEFENDANT'S EXHIBITS					
Ex #	Description	Authenticity	Admissibility	Objection	Admitted
611	Vergheze, P – CV.	Disputed	Disputed	FRE 802, 805, 901	
612	Vergheze, P – Report.	Disputed	Disputed	FRE 802, 805, 901; Plaintiffs' MILs (as to Howd vehicle and related inspection and testing)	
613	Any exhibits listed by Plaintiff.				
614	Any materials produced by Plaintiffs.	Disputed	Disputed	Objections reserved	
615	Any and all impeachment exhibits.	Disputed	Disputed	Objections reserved	
616	Any and all rebuttal exhibits.	Disputed	Disputed	Objections reserved	
617	Any and all deposition transcripts and exhibits.	Disputed	Disputed	Objections reserved	
618	Any and all photographs produced by Plaintiffs.	Disputed	Disputed	Objections reserved	
619	Ford may use any pleadings and discovery responses from Plaintiff consistent with applicable rules; however, Ford does not intend to admit referenced pleadings or discovery as trial exhibits.	Disputed	Disputed	Objections reserved	
620	Autoglass Professionals Workorder dated 2/10/2017. [PL-BEATY 000003]	Stipulated	Stipulated	Trial Stip	

The parties' objection code:

Code	Meaning
Incomplete	Incomplete.
MIL	Subject of Motion(s) <i>in Limine</i> .
Trial Stip	Referring to the Parties' trial stipulation at Dkt. #285.

ACTION BY THE COURT

1. This case is scheduled for a five-day trial before a jury commencing on February 27, 2023.

2. Trial briefs shall be submitted to the Court on or before February 10, 2023.

3. The Court will propose instructions to the Parties. The Parties shall file objections and alternate instructions by February 16, 2023 at 9 a.m. Pacific.

4. The Court will propose voir dire questions to the Parties. The Parties shall file objections and alternatives or additional questions by February 16, 2023 at 9 a.m. Pacific.

5. The parties have agreed that they will prepare their video clips of deposition testimony once the Court has ruled on the parties' designations, counter-designations, and objections.

This order has been approved by the parties as evidenced by the signatures of their counsel. This order shall control the subsequent course of the action unless modified by a subsequent order. This order shall not be amended except by order of the court pursuant to agreement of the parties or to prevent manifest injustice.

RESPECTFULLY SUBMITTED AND DATED this 10th day of February, 2023.

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OK DJ.